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Before the
Federal Communications Commission
Washington, DC 20554

NOV 3 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Application by Verizon New England,)
Inc. Bell Atlantic Communications,)
Inc. (d/b/a Verizon Long Distance),)
NYNEX Long Distance Company,)
(d/b/a Verizon Enterprise Solutions) and)
Verizon Global Networks, Inc., for)
Authorization to Provide In-Region,)
InterLATA Services in Massachusetts)

CC Docket No. 00-176

Reply Comments of

- Keep America Connected
- Association of Late Deafened Adults
- League of United Latin American Citizens
- National Association for the Deaf
- National Association of Commissions for Women
- National Black Chamber of Commerce
- National Urban League
- Telecommunications for the Deaf, Inc.
- United Homeowners Association
- United Seniors Health Cooperative
- United States Hispanic Chamber of Commerce

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November 3, 2000

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The undersigned public interest, minority, consumer, disability, and small business organizations have come together to oppose the Comments to Deny the application by Verizon New England, Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks, Inc., (hereinafter referred to as Verizon) for authorization to provide in-region, interLATA services in Massachusetts. We urge the Commission to approve Verizon's 271 application.

Verizon's entrance into the Massachusetts long distance market will have positive consequences for consumers and it is in the public interest. Most importantly, it will increase competition in the telecommunications marketplace, provide new options and choices for consumers as well foster an environment for affordable telephone rates.

I. Statement of Interests

Keep America Connected (KAC) is an organization comprised of groups whose demonstrated goals involve promoting a variety of telecommunications issues. The primary goal of KAC is that regardless of income, race, disability, age, ethnicity or geographical location, affordable access to the use of the modern telecommunications infrastructure and services should be available. This goal is best achieved through the rapid development of a fully competitive marketplace that ensures that consumers across the nation will have access to more services at lower prices.

The Association of Late Deafened Adults (ALDA) is an organization that works collaboratively with other organizations around the world serving the needs of late-deafened people. Late-deafened usually means deafness that happened post-lingually

(any time after the development of speech and language). ALDA was formed in Chicago, Illinois in 1987 and has a membership that is international in scope.

League of United Latin American Citizens (LULAC) is the oldest and largest Latino civil rights organization in the United States. It represents the interests of the nearly 32 million Hispanics in the United States that make up over 10% of the labor force. It is committed to ensuring Latinos are not left behind as the technological revolution moves forward. LULAC advances the economic condition, educational attainment, political influence, health, and civil rights of Hispanic Americans through community-based programs operating at more than 700 LULAC councils nationwide.

The National Association of the Deaf (NAD) was founded in 1880 and is the oldest and largest organization representing people with disabilities in the United States. NAD safeguards the accessibility and civil rights of 28 million deaf and hard-of-hearing Americans in a variety of areas including education, employment, health care and social services, and telecommunications. A private, non-profit 501(c)(3) organization, the NAD is a dynamic federation of 51 state association affiliates, sponsoring and organizational affiliates, and direct members.

National Association of Commissions for Women (NACW) represents local commissions established to promote the interests of women in cultural, social, and economic fields. NACW supports policies and programs that empower women to make informed choices about all aspects of their lives. NACW has been active in the debate on telecommunications reform, supporting legislative and regulatory initiatives to encourage competition, thereby creating new options and services for women as consumers and in their businesses.

National Black Chamber of Commerce (NBCC) is a nonprofit, nonpartisan, nonsectarian organization dedicated to the economic empowerment of African-American communities. The NBCC has 188 affiliated agencies as members. Throughout the 1990s, African-American businesses in the United States posted sales of more than \$32 billion annually. In general, African-Americans represent an annual spending base of over \$500 billion. NBCC has harnessed much of the power of these dollars and provides unique opportunities for corporations and African-American businesses to partner in creating greater opportunity for all people.

National Urban League, Inc. (NUL), founded in 1910, is the premier social service and civil rights organization in America. The League is a non-profit, community-based organization headquartered in New York City, with 115 affiliates in 34 states and the District of Columbia. The mission of the NUL is to assist African Americans in the achievement of social and economic equality. The League implements its mission through advocacy, bridge building, program services, and research.

Telecommunications for the Deaf, Inc. (TDI) is a national, non-profit advocacy organization established in 1968 to promote full visual access for deaf, hard-of-hearing, and speech-impaired constituencies to entertainment, information, and telecommunications offerings in America. TDI promotes full visual access through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards, and national policy development and advocacy.

United Homeowners Association (UHA) is a national, non-profit, membership based organization that represents the interests of homeowners in Washington, D.C.

UHA has an active communications advocacy program on behalf of its members and promotes the interests of homeowners in telecommunications issues before Congress, the FCC, and the courts.

United Seniors Health Cooperative (USHC) is a non-profit organization comprised of thousands of consumers, advocates and eldercare professionals who are committed to the belief that informed consumers are those best able to help themselves. USHC is a leading source of accurate, unbiased information on a wide range of issues from health to telecommunications.

United States Hispanic Chamber of Commerce (USHCC) is a national organization that represents the interests of the Hispanic business community in the United States before the public and private sectors. Since its inception in 1979, the USHCC has worked through its network of nearly 200 Hispanic Chambers of Commerce and Hispanic business organizations to bring the issues and concerns of the nation's nearly 1.3 million Hispanic-owned businesses to the forefront of the national economic agenda. Currently, these businesses generate over \$200 billion in annual gross receipts. Throughout the years, the Chamber has also enjoyed outstanding working relationships with international Heads of State.

I. Comments

The Commenters understand that some opposition to authorizing Verizon to provide long distance telephone service in the state of Massachusetts has been raised. In fact, it does not surprise us that the Association for Local Telecommunications Services (ALTS) Coalition recommended denial of Verizon's 271 application. The ALTS Coalition has consistently opposed every 271 long distance application filed with the

Commission. What the Commenters find most astounding, however, is the ALTS Coalition's assertion that "even if the Commission were to conclude that Verizon-MA has satisfied the competitive checklist, it should find that approval of its application is not consistent with the public interest."¹ This is absurd in light of the mounting evidence that entry into the long distance market by the Regional Bell Operating Companies (RBOCs) is having positive consequences for residential and business customers. To deny consumers more competition, new choices, innovative services, one-stop shopping conveniences, and an opportunity to save money on telephone costs, as the ALTS Coalition would have the Commission do by denying the Massachusetts 271 application, is to violate the public interest standard that we trust the Commission to uphold.

Not only do the Commenters believe that entry into the long distance market in Massachusetts by Verizon is in the public interest, but the Commenters also believe the Verizon application should be approved on its merits as endorsed by the Massachusetts Department of Telecommunications and Energy (DTE). For over 16 months, Verizon and the DTE worked diligently through extensive testing and public scrutiny to ensure the Massachusetts local exchange market is open to competition. The DTE concluded "the local exchange market in Massachusetts is 'irreversibly open to competition.'"² and that "Verizon Massachusetts has met the requirements of Section 271 (c) of the Telecommunications Act of 1996 in Massachusetts."³ The Commenters urge the Commission to recognize the hard work of the DTE which painstakingly conducted "five

¹ See Comment filed by the Association for Local Telecommunications Services (ALTS) Coalition in the Matter of the Application by Verizon New England, Inc for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 11-176, page 48-49

² See "Evaluation of the Massachusetts Department of Telecommunications and Energy" In the Matter of Application by Verizon New England, Inc for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 00-176, page 1.

³ Ibid

days of public hearings across Massachusetts, almost 30 days of technical sessions, over a thousand information and record requests and thousands of pages of filings and testimony.”⁴ Clearly, this demonstrates the commitment of both the DTE and Verizon to meet the letter and spirit of the Telecommunications Act of 1996. The Massachusetts application should not be denied due to the misplaced scare tactics of the ALTS Coalition which claims that “there are circumstances in Massachusetts that would make Verizon-MA’s entry into the interLATA long distance market contrary to the public interest.”⁵

The Commenters remind the Commission that every day a RBOC is kept out of the long distance market marks an additional day the benefits of increased competition and choice for all telecommunications consumers is not being realized. Without the entry of a new and major competitor for long distance services in Massachusetts, there is little incentive or challenge to incumbent long distance providers to compete for low volume users or to aggressively expand their local telephone market services. Yet, when Verizon entered the long distance market in New York, WorldCom, Sprint and AT&T responded by introducing new calling plans for bundled services that lower the total cost of local and long distance telephone service. As indicated in the comments filed by the Telecommunications Research and Action Center (TRAC), “Overall, New York consumers are saving up to \$217,000,000 annually. As a result of new competition in local and long distance markets, approximately \$46 to \$120 million of these savings are in local service bills and approximately \$66 to \$97 million of these savings are in long distance bills. This translates into individual monthly savings of \$5.50 to \$8.08 for local

⁴ Ibid, See the Executive Summary, page 1.

⁵ See Comment filed by the Association for Local Telecommunications Services (ALTS) Coalition in the Matter of the Application by Verizon New England, Inc for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 00-176, page 49

service and \$3.87 to \$10.04 for long distance.”⁶ All consumers should experience the benefits of a robust competitive environment like the consumers in New York. Massachusetts consumers are only one regulatory step away.

The Commenters urge the Commission to approve Verizon’s 271 application. The denial of Verizon’s application is not in the public interest as the ALTS Coalition purports and would disregard the DTE commitment to fully implement the Telecommunications Act of 1996. Like the DTE, the Commenters believe “that there are benefits inherent in a competitive marketplace that encourage greater levels of economic efficiency and fairness than does a regulated monopoly environment.”⁷ The Commenters understand and appreciate the Commission’s role in carefully examining the Verizon Massachusetts application, but the Commission should not place disproportionate weight on the opposition of the ALTS Coalition.

III. Conclusion

The Commenters recommend the Commission approve the Verizon application to provide long distance service in Massachusetts. While the Commenters acknowledge that we are not experts in the intricacies of the technical dimensions associated with the Application, the Commenters are confident that the DTE, Verizon, and the Commission will resolve any legitimate issues swiftly. Resolution of these issues may be grounds for conditions, but the Massachusetts application should be approved. Verizon and the DTE stated that all of the requirements to provide long distance service have been met and

⁶ See Comment filed by the Telecommunications Research Action Center in the Matter of the Application by Verizon New England, Inc for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 00-176, page 3.

⁷ See “Evaluation of the Massachusetts Department of Telecommunications and Energy” In the Matter of Application by Verizon New England, Inc for Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 00-176, page 2-3.

Verizon has clearly demonstrated the public interest of RBOC entry into the long distance market as evidenced by the positive effects in New York. The Commission must look at the pro-competitive benefits of the Massachusetts long distance application and quickly approve it.

Respectfully submitted,



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